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 7 Attorneys for Litchfield Park Service Company

2010 FEB 10 P 3:01

AZ CORP COMMISSION  
DOCKET CONTROL

**BEFORE THE ARIZONA CORPORATION COMMISSION**

8 IN THE MATTER OF THE APPLICATION  
 9 OF LITCHFIELD PARK SERVICE  
 10 COMPANY FOR APPROVAL OF AN  
 11 ACCOUNTING ORDER AUTHORIZING  
 12 THE DEFERRAL OF COSTS  
 13 ASSOCIATED WITH EFFORTS TO  
 14 ADDRESS THE POTENTIAL  
 15 CONTAMINATION OF WATER SUPPLY  
 16 LOCATED IN MARICOPA COUNTY,  
 17 ARIZONA

DOCKET NO. W-01427A-06-0807

**NOTICE OF FILING**

18 Litchfield Park Service Company ("LPSCO" or "Company") hereby files this  
 19 Notice of Filing in the above-captioned docket. Attached hereto as **Exhibit A** is a letter  
 20 dated February 5, 2010 from Charles P. McClendon, City Manager for the City of  
 21 Avondale, and Darryl H. Crossman, City Manager for the City of Litchfield Park, to  
 22 Mr. Keith Takata, the Director of the Superfund Division of the USEPA. The letter  
 23 requests the EPA's continued assistance in ensuring that all actions necessary are  
 24 implemented at the Phoenix-Goodyear Airport North (PGA-North) Superfund site to  
 25 protect the groundwater resources of the Cities of Avondale and Litchfield Park.

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Arizona Corporation Commission

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RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of February, 2010.

FENNEMORE CRAIG, P.C.

By 

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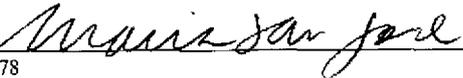
An **ORIGINAL** and 13 copies of the foregoing was hand-delivered this 10<sup>th</sup> day of February, 2010 to:

Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

**COPY** hand-delivered this 10<sup>th</sup> day of February, 2010 to:

Janice Alward, Chief Legal Counsel  
Legal Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

Steven M. Olea, Acting Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

By:   
2283778

**Litchfield Park Service Company**  
**DOCKET NO. W-01427A-06-0807**

# **Exhibit A**



February 5, 2010

Mr. Keith Takata  
Director, Superfund Division  
U.S. Environmental Protection Agency Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: Additional Response Actions Requested for  
Phoenix-Goodyear Airport North Superfund Site**

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Dear Mr. Takata:

Your assistance is requested in ensuring that all actions necessary are implemented at the Phoenix-Goodyear Airport North (PGA-North) Superfund Site, without further delay, to protect the groundwater resources of the Cities of Avondale and Litchfield Park ("the Cities").

The Cities gratefully acknowledge EPA's efforts in overseeing the implementation of the EA-05 and EA-06 groundwater extraction systems. These two remediation systems were a positive first step in containing the northeast portion of the PGA-North plume. The inadequacy of these existing remediation systems to fully contain the plume north of Interstate 10, however, is shown by groundwater monitoring data. The plume continues to migrate to the northeast and the plume's progress as it spreads into the City of Avondale threatens nearby public supply wells. This plume migration is insufficiently monitored by the available well network.

TCE is in a well, Suncor 26A<sup>1</sup>, located ½-mile northeast of the previously assumed plume boundary, and closer to City of Avondale and Liberty Water potable municipal wells. Twenty-seven years after the Site was discovered and 20 years after EPA first ordered the implementation of a groundwater remedy, the Cities are deeply concerned that the plume is not yet fully contained and Crane Co. is no closer to having a final remedy in place at the site.

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<sup>1</sup> Grab samples detected TCE concentrations of 2.8 ug/L in August, 6.6 ug/L in November and 0.88 ug/L in December. Vertical profiling has not yet been conducted to determine if these detections accurately reflect the full extent of TCE impacts at this location.

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**Administration**

11465 W. Civic Center Drive • Avondale, AZ 85323  
Phone: (623) 333-1000 • Fax: (623) 333-0100 • TDD: (623) 333-0010  
[www.avondale.org](http://www.avondale.org)

Crane Co. has developed a draft Work Plan to expand the groundwater remedy in the northeast portion of the PGA-North Site. But the current plan calls only for the installation of one<sup>2</sup> new extraction well (EA-07) at 500 gpm and two new injection wells (IA-11 and IA-12) one mile apart to re-inject the treated water.

The Cities are concerned that the system proposed by Crane Co. will likely be inadequate to fully contain the plume based on the measured performance data from the existing EA-05 and EA-06 remediation systems (as stated by the Cities' technical representative at a December 8, 2009, PGA-North Site meeting). Absent increased groundwater extraction, additional water must be injected into the aquifer via more closely spaced injection wells to create a sufficient hydraulic barrier to contain the plume and protect our groundwater resources.

At the December project meeting, the Cities' minimum recommendations included:

- i. Installation of three *additional* injection wells between the proposed IA-11 and IA-12 locations<sup>3</sup> as part of the current remediation system expansion plan;
- ii. Sending all treated water from the EA-06 remediation system to the new injection well network as soon as a pipeline and injection wells can be installed, while waiting for the completion of the EA-07 remediation system; and
- iii. Installation of additional monitoring wells in the northeast portion of the Site to monitor the effectiveness of the extraction/injection systems.

EPA's technical consultant as well as other concerned parties at the meeting agreed that these measures were necessary.

Crane Co.'s "wait and see" approach of not considering installing additional injection wells until after the proposed EA-07 system is in place and allowed to operate for an extended period is unacceptable to the Cities. Containment of the full extent of the plume is not supported by past performance data from the existing systems. In addition, the current monitoring well network in the northeast portion of the Site is inadequate to monitor the effectiveness of the system.

Using this approach, the plume extent will only be detected AFTER down gradient public supply wells become contaminated; this is backward logic. The recent observation of TCE in Suncor 26A only heightens our concern that appropriate response actions to control the plume are already too late.

Rapid spread of the uncontained plume in the northeast portion of the Site over the last several years has been seen by EPA and the Cities. TCE detections in Suncor 26A and the significant increase in TCE concentrations recently seen in monitoring well EPA MW-35A show the risk faced by existing municipal supply wells and consumers – a risk

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<sup>2</sup> In a letter dated August 24, 2009, the Cities' technical representative commented on the initial draft plan and requested that a second extraction well and multiple injection wells be installed.

<sup>3</sup> Technical details would need to be resolved regarding the appropriate placement of the new injection wells.

that is not acceptable to the Cities. The ability of the City of Avondale and other water providers, such as Liberty Water Co., to efficiently operate their existing water supply systems or effectively plan to meet future water demands is adversely impacted as the plume continues to increase in size. Immediate action is required.

The Cities of Avondale and Litchfield Park request:

1. Immediate expansion of the proposed injection well network with three additional injection wells in the northeast portion of the Site;
2. Sending all remediated water from the existing EA-06 treatment plant to the new injection well network as soon as possible;
3. Injection of all future water from the proposed EA-07 remediation system into the new injection well network upon completion of the new extraction well;
4. Installation of sufficient monitoring wells in the northeast portion of the Site to monitor the effectiveness of the extraction and injection system in capturing the plume;
5. Examination by EPA of the need for additional groundwater extraction wells beyond EA-07 in the northeast portion of the Site to ensure full and effective containment of the plume; and
6. Evaluation by EPA of adding additional pipelines and an additional injection well to take treated water from the EA-05 remediation system and inject it in the area between Suncor 3B and Avondale's municipal supply well COA-18.

Once these emergency containment measures are implemented, the Cities look forward to working with EPA and the other stakeholders at identifying a final remedy that will minimize the time necessary to restore the groundwater at the Site.

The Cities appreciate EPA's continued support in ensuring that the necessary remedial actions are implemented at the PGA-North Site. We would appreciate a written response to our request. Please let us know if our joint technical consultant or our respective staff can do anything to help.

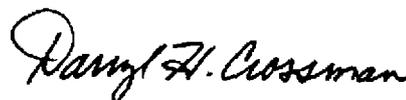
Sincerely,

(In counterparts)  
City of Avondale



Charles P. McClendon  
City Manager

City of Litchfield Park



Darryl H. Crossman  
City Manager

cc: Andrew McGuire – Avondale Legal Counsel  
Marilyn DeRosa – Avondale Water Resources Department  
Susan Goodwin – Litchfield Park City Counsel

Tom Suriano – Clear Creek Associates, PLC

Woodrow Scoutten – W.C. Scoutten, Inc.

Sheryl Bilbrey – EPA

Catherine Brown – EPA

Amanda Stone – ADEQ

Julie Riemenschneider – ADEQ

Harry Hendler – ADEQ

Nichole Coronado – ADEQ

Bob Peeples – ADEQ

Phil Whitmore – CH2M Hill

Leanne Austrins – CH2M Hill

Mathew Garlick – Liberty Water Company ✓

Dr. Anthony Pantalioni – Crane Co.

Al Bilzi – Environmental Venture Group

Kirk Craig – AMEC Geomatrix